

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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BRENDA LEUZZI and GEORGE LEUZZI,	:	
	:	
Plaintiffs,	:	<b>6:14-CV-6218 (DGL)(JWF)</b>
	:	
-against-	:	
	:	
ETHICON INC., ETHICON ENDO SURGERY,	:	
INC., ETHICON WOMEN'S HEALTH AND	:	
UROLOGY, a division of ETHICON, INC. and	:	
ABC CORPORATIONS 1-10 and JOHN DOES 1-	:	
10 and JANE DOES 1-10,	:	
	:	
Defendants.	:	
	:	
	:	

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**JOINT SUBMISSION OF PROPOSED DISCOVERY PLAN AND PROPOSED  
STIPULATED ORDERS**

Pursuant to the Court's August 12, 2014 Order [Dkt. # 11], Plaintiffs Brenda and George Leuzzi (Plaintiffs) and Defendant Ethicon (Defendant) hereby respectfully jointly submit the attached Joint Report of Rule 26(f) Conference and Proposed Discovery Plan. *See Exhibit 1.* Plaintiffs and Defendant also jointly submit herewith the attached Stipulation and [Proposed] Protective Order Regarding Confidential Discovery Materials, and the [Proposed] Stipulated Scheduling Order, and respectfully request entry thereof. *See Exhibits 2 & 3.*

Dated October 1, 2014

Respectfully Submitted,

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*/s/ Andres Alonso*  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 1<sup>st</sup> day of October, 2014, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon all counsel of record.

/s/ Susan L. Lawless